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VIA ECF

The Honorable Colleen McMahon
United States District Judge
United States District Court
500 Pearl Street
New York, NY 10007-1312

Re: *USA v. Maldonado et al.*
1:16-cr-00285-CM (S.D.N.Y.)


Dear Judge McMahon:

This Firm, along with Cleary Gottlieb Steen & Hamilton LLP, represents Defendant Antontonio Maldonado in the above-referenced matter. We write on behalf of Mr. Maldonado to: (1) withdraw Mr. Maldonadano's initial Motion for Compassionate Release (ECF #119); (2) propose a briefing schedule for a new Motion for Compassionate Release; and (3) seek leave from the Court to file Mr. Maldonado's medical records under seal in support of his new Motion for Compassionate Release.

The Government, specifically Ms. Kimberly Ravener, Assistant United States Attorney, has consented to the proposal outlined above. The parties agreed that Mr. Maldonado will file his Motion for Compassionate Release on or before December 17, 2020. The Government will have until January 6, 2021 to file opposition, if any. Any reply brief would be filed on before January 13, 2021.

Thank you for your consideration of this matter.

Respectfully submitted,



Matthew Savage Aibel

cc: All Counsel of Record (VIA ECF)

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